

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JAMES ALLEN and ELIZABETH THOMAS, <i>Plaintiffs</i>	§	
	§	
VS.	§	
	§	CIVIL ACTION
MERITAGE HOMES CORPORATION f/k/a Meritage Corporation,	§	NO. 4:22-CV-00742
f/k/a Legacy Monterey Homes, LP; MERITAGE HOMES OF TEXAS	§	
LLC f/k/a Meritage Homes of Texas LP f/k/a Legacy Monterey Homes	§	
LP; MTH LENDING GROUP L.P.; PRIMARY RESIDENTIAL	§	
MORTGAGE INC.; MARY A. LESTER; STEWART TITLE	§	
COMPANY; CHRISTOPHER KOTRAN, President of the Miramar	§	
Lake Homeowners Association, Inc., <i>Defendants</i>	§	
	§	
Consolidated With	§	
	§	
ELIZABETH THOMAS et al., <i>Plaintiffs</i>	§	
	§	
VS.	§	
	§	
MICHAEL J. PIZZITOLA, JR. et al., <i>Defendants</i>	§	
	§	
Consolidated With	§	
	§	
PRIMARY RESIDENTIAL MORTGAGE, INC. et al., <i>Plaintiffs</i> ,	§	
	§	
VS.	§	
	§	
ELIZABETH THOMAS, et al., <i>Defendants</i>	§	

CERTIFICATE OF INTERESTED PARTIES

Pursuant to the Court’s Order for Conference and Disclosure of Interested Parties dated March 24, 2022, and Federal Rule of Civil Procedure 7.1(a), Primary Residential Mortgage, Inc. (“PRMI”) files this list of persons, associations of persons, firms, partnerships, corporations, affiliates, parent corporations, or other entities that are, or may be, financially interested in the outcome of this litigation.¹ PRMI provides the specific information regarding other entities besides

¹ PRMI is not receiving notice of this Court’s filings, due to the caption on the Notice of Removal stating that the case is “wrongfully listed as Cause No. 2017-76078” and references another Cause No. instead—a number that does

itself (i.e., the identity of any parent corporation and any publicly held corporation owning 10% or more of a corporate party's stock) based on information and belief. The names of all corporations whose securities are publicly traded are underlined.

1. Primary Residential Mortgage, Inc. ("PRMI") is a wholly owned subsidiary of Primary Residential Group, Inc., which is a privately held company. There is no parent corporation or any publicly held corporation that owns 10% or more of PRMI's stock.

2. Meritage Homes Corporation is a publicly traded company (NYSE: MTH).

3. Meritage Homes of Texas, LLC, is an interested entity.

4. MTH Lending Group, LP ("MTH Lending") is a limited partnership. One of its limited partners, Meritage Homes of Texas, LLC, is a subsidiary of Meritage Homes Corporation, a publicly traded company (NYSE: MTH).

5. Stewart Title Company ("STC") is a wholly owned subsidiary of Stewart Title Guaranty Company ("STGC"). STGC is a wholly owned subsidiary of Stewart Information Services Corporation, a publicly traded company (NYSE: STC). To PRMI's knowledge, no public company has an ownership of 10% or more of Stewart Information Services Corporation.

6. JPMorgan Chase Bank, N.A. is a wholly owned subsidiary of JPMorgan Chase & Co., a publicly traded company (NYSE: JPM).

7. Miramar Lake Homeowners' Association, Inc. ("Miramar") is a domestic nonprofit corporation with its principal place of business in Houston, Texas. Miramar is a homeowners' association comprised of all of the property owners within the Miramar Lake subdivision. To

not actually exist in the Harris County District Courts. Assuming that the Cause No. listed is a typographical error, the presumed case is an entirely separate case from the case that was removed to this Court. The misstatement has apparently led to confusion in the U.S. District Clerk's office, which will not provide service to the proper counsel, despite counsel's requests for service/notice.

PRMI's knowledge, Miramar has no parent corporation, and no publicly held company owns 10% or more of Miramar's stock.

8. Elizabeth Thomas.
9. James Allen.
10. Robert L. Thomas.
11. Allan Haye.
12. Colleen M. McClure.
13. James M. Andersen.
14. Maria Dejesus Perez.
15. Roberto Perez.
16. Alvin R. Mullen.
17. Catrice Henry.
18. Albert Perry.
19. Mary A. Lester.
20. Michael J. Pizzitola, Jr.
21. Kevin Meuth.
22. David Jordan.
23. Rodney B. Howerton.
24. David Modlin.
25. Jeff Barfield.
26. Michael Materna.
27. Chris Huebner.
28. Melissa Hanna.

PRMI is not aware of any other persons, associations of persons, firms, partnerships, corporations, affiliates, parent corporations, or other entities that are financially interested in the outcome of this litigation other than those persons identified above. However, if such information becomes available, PRMI will supplement this list if additional parties are added or if additional interested parties are identified in accordance with the Court's instructions and/or the Federal Rules of Civil Procedure.

Respectfully submitted,

McKINNEY TAYLOR P.C.

By: /s/ Gwen E. Richard

Gwen E. Richard

S.D. Tex. ID No. 12923

State Bar No. 16842730

richard@mckinneytaylor.com

Andrew T. McKinney IV

State Bar No. 13716800

mckinney@mckinneytaylor.com

State Bar No. 24116679

Three Riverway, Suite 900

Houston, Texas 77056

Telephone: (713) 487-1487

Facsimile: (713) 487-1488

**ATTORNEYS FOR PRIMARY RESIDENTIAL
MORTGAGE, INC.**

CERTIFICATE OF SERVICE

I certify that on April 8, 2022, the foregoing document was served on the following counsel of record and pro se parties by First Class U.S. Mail, email, and/or the Court's CM/ECF system, as follows:

Colleen M. McClure
18482 Kuykendahl Rd.
Box 106
Spring, TX 77379
Email: Colleen.mcclure@att.net

Via CM/ECF and Email

Elizabeth Thomas, pro se
712 H St. NE Suite 1297
Washington, DC 20002
Email: tethomas3@aol.com
Email: elizthomas234@gmail.com

Via First Class U.S. Mail and Email

Kim Altsuler
Peckar & Abramson, P.C.
3050 Post Oak Boulevard, Suite 500
Houston, Texas 77056
kaltsuler@pecklaw.com

Via CM/ECF and Email

Dale M. "Rett" Holiday
Germer PLLC
2929 Allen Parkway, Suite 2900
Houston, Texas 77019
holidyefile@germer.com

Via CM/ECF and Email

John A. Koepke
Scott M. McElhaney
Jackson Walker L.L.P.
2323 Ross Ave., Ste. 600
Dallas, Texas 75201
jkoepke@jw.com
smcelhaney@jw.com

Via CM/ECF and Email

James M. Andersen
P.O. Box 58554
Webster, TX 77598
jandersen.law@gmail.com

Via First Class U.S. Mail and Email
Note: Will Attempt Service Via CM/ECF

/s/ Gwen E. Richard
Gwen E. Richard